

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
(EAST ST. LOUIS)

JESSE WARD

Plaintiff,

- against -

CONSEQUENCE HOLDINGS, LLC

Defendant.

Docket No. 3:18-cv-01734 (NJR-MAB)

**[PROPOSED] ORDER**

WHEREAS, by order dated May 7, 2020, The Court awarded Defendant Consequence Holdings, LLC (“Defendant” or “Consequence Holdings”) \$10,000 in attorneys’ fees and costs pursuant to the Court’s inherent powers, as well as imposed \$10,000 in sanctions against Plaintiff’s counsel, Richard Liebowitz, payable to the Clerk of Court. [Dkt. #39]

WHEREAS, Plaintiff Jesse Ward (“Plaintiff” or “Ward”), via counsel, has moved the Court for an entry of an order establishing a one-year (12-month) installment payment plan concerning Plaintiff’s counsel’s obligation to pay monetary sanctions pursuant to the Court’s May 7, 2020 order.

FOR GOOD CAUSE SHOWN, IT IS HEREBY ORDERED, ADJUDGED AND DECREED, that Richard Liebowitz and Liebowitz Law Firm, PLLC, jointly and severally, shall be obligated to pay the \$20,000 in monetary sanctions as follows: monthly payments of \$1666.66 per month, half of which shall be paid to the Clerk of

Court and the other half to be paid to Defendant each month for 12 months, beginning on  
\_\_\_\_\_, 2020.

East St. Louis, Illinois  
Dated: June \_\_\_, 2020

**SO ORDERED:**

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NANCY J. ROSENSTENGEL  
Chief U.S. District Judge

**CERTIFICATE OF SERVICE**

The undersigned certifies that on June 5, 2020, a true and correct copy of the foregoing motion for an installment plan was served by CM/ECF on counsel of record below:

Dan Booth, Esq.  
Dan Booth Law LLC  
60 Thoreau Street #121  
Concord, MA 01742  
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*Counsel for Defendant  
Consequence Holdings, LLC*

s/richardliebowitz/  
Richard Liebowitz, Esq.